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SABIC INNOVATIVE PLASTICS SALARY CONTINUANCE
PLAN and SABIC INNOVATIVE PLASTICS, INC.

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Attorney for Plaintiff
LAURIE COUTO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE DIVISION)**

LAURIE COUTO,

Case No. CV12-00633

Plaintiff,

**STIPULATION AND [PROPOSED] ORDER
TO EXTEND TIME TO RESPOND TO
FIRST AMENDED COMPLAINT**

V.

SABIC INNOVATIVE PLASTICS SALARY
CONTINUANCE PLAN, SABIC
INNOVATIVE PLASTICS, INC., and DOES
ONE through TEN, inclusive

Complaint Filed: February 9, 2012
Trial Date: None Set
Judge: Hon. Ronald M. Whyte

Defendants.

1 Pursuant to Local Rule 6-2, this stipulation is made by and between plaintiff Laurie Couto
 2 ("Plaintiff") and Defendants SABIC Innovative Plastics Salary Continuance Plan ("the Plan") and
 3 SABIC Innovative Plastics, Inc. ("SABIC") (collectively, "Defendants") (collectively, including
 4 Plaintiff, "the Parties"), by and through their respective counsel of record, with respect to the
 5 following:

6 WHEREAS, on May 8, 2013, Plaintiff filed her First Amended Complaint (the "FAC")
 7 against Defendants;

8 WHEREAS, pursuant to Rules 15(a)(3) and 6(d) of the Federal Rules of Civil Procedure,
 9 Defendants' response to the FAC is due March 25, 2013;

10 WHEREAS, due to the temporary absence of SABIC personnel whose work is essential to
 11 Defendants' response to the FAC, Defendants have requested an extension of the time for their
 12 response to the FAC, to April 5, 2013;

13 WHEREAS, Plaintiff has agreed to Defendants' request for such an extension;

14 WHEREAS, at the most recent Case Management Conference, the Court ordered that the
 15 First Amended Complaint should be filed and responded to prior to the currently-scheduled April
 16 12, 2013 Case Management Conference;

17 WHEREAS, the Parties' stipulated due date (April 5, 2013) will be the same as the due date
 18 for the Parties' Case Management Statement for the April 12, 2013 Case Management Conference;

19 WHEREAS, pursuant to Local Rule 6-2(a)(2), the previous time modifications in this case
 20 were: (1) Continuance of case management conference from August 24, 2012 to October 19, 2012
 21 (see Document 12, filed August 14, 2012); and (2) Continuance of case management conference
 22 from January 18, 2013 to February 8, 2013 (see Document 19, filed January 17, 2013).

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1 THEREFORE THE PARTIES STIPULATE that Defendants' time to respond to the FAC
2 should be extended to April 5, 2013.

3 IT IS SO STIPULATED.

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5 DATED: March 20, 2013

OGLETREE, DEAKINS, NASH, SMOAK &
6 STEWART, P.C.
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8 By: /s/ Christopher M. Ahearn
Eric P. Mathisen
Christopher M. Ahearn
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10 Attorneys for Defendant
SABIC INNOVATIVE PLASTICS SALARY
11 CONTINUANCE PLAN
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14 DATED: March 20, 2013

WOLFORD LAW FIRM
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16 By: /s/ Jason Wolford
Jason Wolford
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18 Attorneys for Plaintiff
LAURIE COUTO
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1 **[PROPOSED] ORDER**
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Having considered the submission of the parties and, good cause showing, the stipulation to
extend time for Defendants to respond to the First Amended Complaint is GRANTED. Defendants
shall have until April 5, 2013 to respond to the First Amended Complaint.

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6 IT IS SO ORDERED.
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Ronald M. Whyte
Ronald M. Whyte
United States District Judge